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December 26, 2017

To whom it may concern,

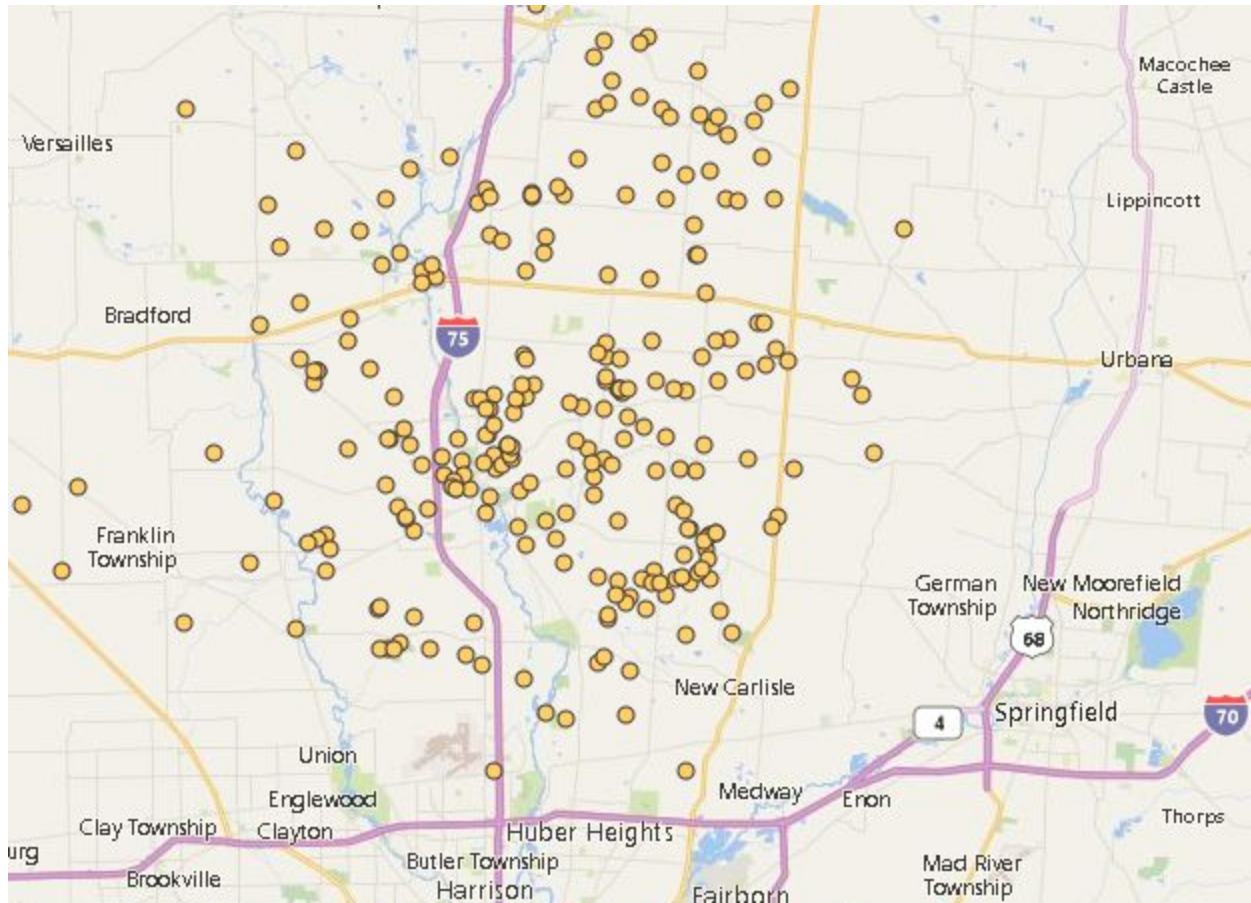
Imagine Networks is a Wireless Internet Service Provider deploying Fixed Wireless Broadband services to the south west region of Ohio. We serve about 500 residences and businesses in a rural area where no high speed Internet access besides us is available. In the unfortunate situation where we are not able to serve them, they are left without any Internet service. We aim to minimize or eliminate this problem with equipment that operates in the CBRS band. Our current offered speed plans are up to 10 megabit per second, with some faster plans in some areas with special circumstances.

We have deployed some devices in the 3650-3700 range with our NN license. This has been a bit of an experiment to test the waters and we were expected to expand this endeavour with the additional frequencies available to us in this region with the CBRS rules initially proposed in April 2015. We began our business in 2006. Over the years we have lost the availability of 900 MHz and 2.4 GHz due to interference of varying degrees. We now operation heavily in the 5 GHz band but have little to no non-line of site capabilities. Trees are an extreme problem for us and have found LTE in 3650 to be a usable resolution. Having an additional 100 MHz would be an absolutely remarkable tool and I believe many homes with no Internet access today would be at the utmost appreciation.

In recent years, the FCC has expanded the use and rules for the 5 GHz band. It would be a remarkable tool to do the same in the 3.65 GHz band. We strongly oppose the proposal to increase the size of PALs. We strongly oppose the use of PEA.

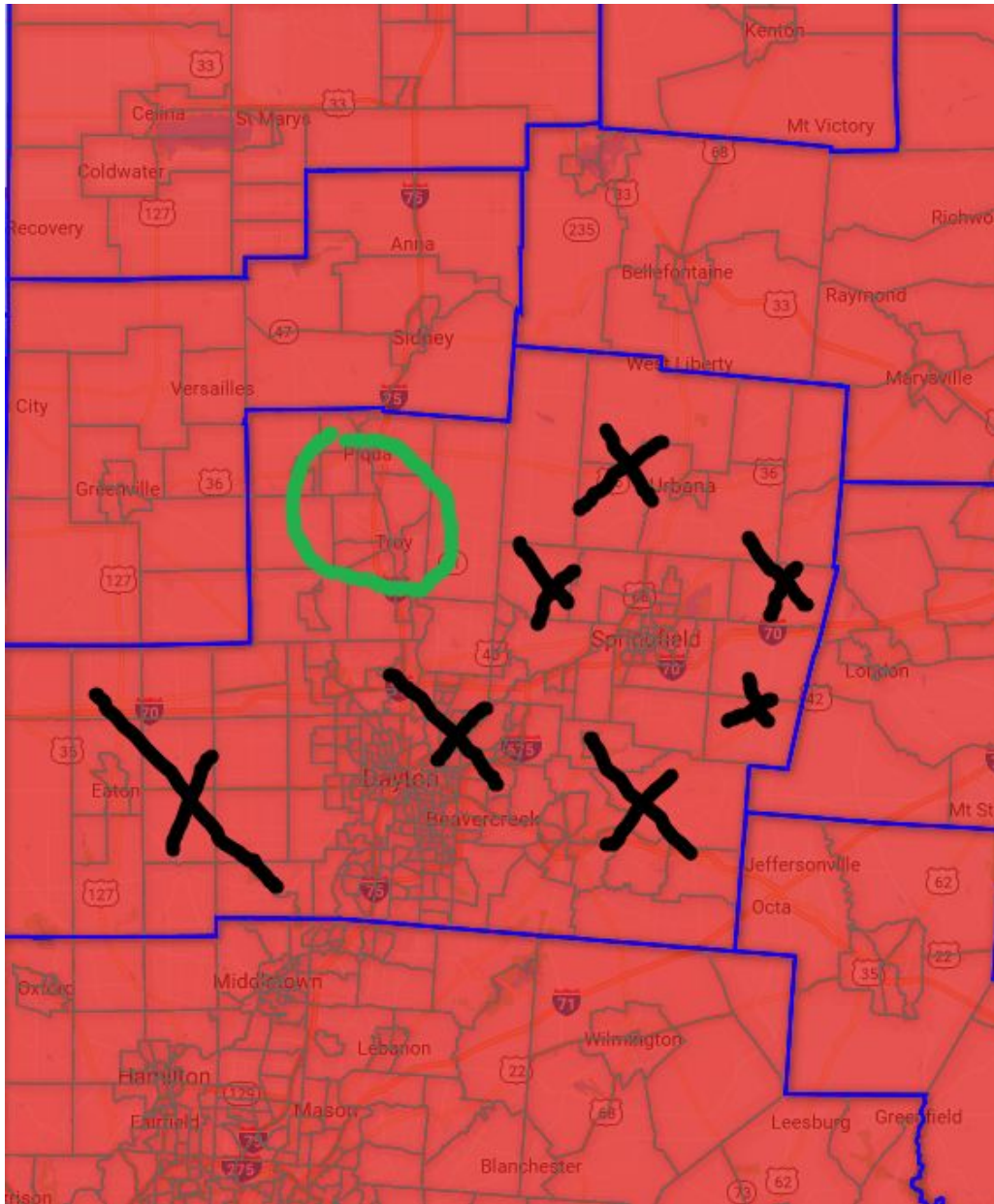
Josh Luthman, President
Imagine Networks

Failed installs



These are customers that have signed up for service but we were unable to serve due to trees, obstructions, and other cause for lack of strong enough signal. A lower frequency with better technology in the CBRS band would enable us to provide high speed Internet to these homes.

PEA versus Census Tract



We are very interested in the green highlighted area. This is our service area. We are not interested in the majority of this PEA as it is not in our service area. It is also expected to be cost prohibitive due to the inclusion of Dayton, OH - a city already served with fiber and cable Internet services.